

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNIRAM TECHNOLOGY, INC.,

No. C 04-1268 VRW (MEJ)

Plaintiff(s),

**ORDER RE: INTERROGATORY NO. 12**

vs.

MONOLITHIC SYSTEM TECHNOLOGY,  
INC, et al.,

Defendant(s).

The Court is in receipt of the parties' joint meet and confer letter, filed February 8, 2006, regarding plaintiff UniRAM Technology, Inc.'s ("UniRAM") response to defendant Taiwan Semiconductor Manufacturing Company, Ltd.'s ("TSMC") Interrogatory No. 12. Docket #154. Interrogatory No. 12 seeks the following: "For each trade secret that UniRAM claims TSMC misappropriated, identify when and how UniRAM believes it was obtained by TSMC." In response, UniRAM referred TSMC to its Second Supplemental Trade Secret Disclosure.

TSMC argues that instead of answering when and how each alleged trade secret was obtained by TSMC, that disclosure refers repeatedly to the same 26 documents, unidentified discussions, and nine tape outs. In response, UniRAM argues that its disclosure describes each trade secret in detail and, separately for each trade secret, identifies when and how that secret was first disclosed to TSMC.

Upon review of UniRAM's disclosure, the Court finds that UniRAM failed to respond to Interrogatory No. 12 with specificity. Specifically, UniRAM responds generally that each trade

1 secret was disclosed through "Presentations," "R&D Disclosures," "Tape Outs," and "Studies," yet  
2 no specific documents or materials are identified. Accordingly, the Court ORDERS UniRAM to  
3 respond to Interrogatory No. 12 by stating for each alleged trade secret, the specific disclosure  
4 within the documents and materials in which UniRAM contends it communicated the alleged trade  
5 secrets to TSMC and who received that communication. UniRAM shall update its response within  
6 30 days from the date of this Order.

7 **IT IS SO ORDERED.**

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9 Dated: February 14, 2006

  
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10 MARIA-ELENA JAMES  
11 United States Magistrate Judge  
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